

EXHIBIT “2”

Ms. Heras is the Plaintiff in this matter.

2. **Kimberly Sowell**
c/o Robert D. Kilgore, Esq.
FISHER & PHILLIPS, LLP
300 Convent Street, Suite 1420
San Antonio, Texas 78205

Ms. Sowell is a co-Defendant in this case

3. **Richard Sowell**
2324 Village Path
New Braunfels, TX 78130c

Mr. Sowell is a co-Defendant in this case.

4. **Elizabeth Landry**

c/o Robert D. Kilgore, Esq.
FISHER & PHILLIPS, LLP
300 Convent Street, Suite 1420
San Antonio, Texas 78205

Ms. Landry is Defendant's General Manager and has personal knowledge regarding Defendant's personnel and human resources policies, procedures and practices.

Defendant reserves the right to amend or supplement this list as the discovery process develops.

B. Exhibit List - Rule 26(a)(1)(A)(ii):

The following documents, data compilations, and tangible things may be used by Defendant to support its defenses.

1. Personnel documents relating to Plaintiff;
2. Payroll documents relating to Plaintiff;
3. Defendant's personnel policies and procedures;
4. Notes about customer complaints.
5. Security videos.
6. Employee and Manager Handbooks.

6. Any documents identified and/or produced by Plaintiff during the course of discovery.

Defendant reserves the right to amend or supplement this list as the discovery process develops.

C. Damages - Rule 26(a)(1)(A)(iii):

Defendants are not claiming any damages in this case at this time, but reserves the right to seek all legal and equitable remedies to which it may be entitled, including the costs incurred in defending this lawsuit.

D. Insurance - Rule 26(a)(1)(iv):

There is no insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Respectfully submitted,

By: 

Robert D. Kilgore

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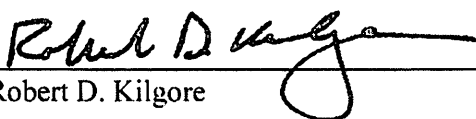
Email: rkilgore@laborlawyers.com

**ATTORNEYS FOR DEFENDANTS
RAPID TAX, INC., AND
KIMBERLY J. SOWELL**

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of September, 2013, I have served a true and correct copy of *Defendants' Rule 26(a) Initial Disclosures*, via Certified Mail/Return Receipt Requested and Electronic Mail, on all counsel of record as listed below.

Lawrence Morales, II, Esq.
Chuck Shipman, Esq.
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Robert D. Kilgore